

ROCKY FLATS ENVIRONMENTAL TECHNOLOGY SITE REGULATORY CONTACT RECORD

Date/Time: February 16, 2005

Site Contact(s): Dyan Foss
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Agency: CDPHE

Purpose of Contact: Disposition of Survey unit 38

Discussion

In accordance with the 776/777 DOP, Appendix I, the preparation of the facility for demolition is conducted in consultation with the CDPHE and is based on a series of decisions primarily related to maintaining releases to the environment and doses to the workers as low as reasonably achievable (ALARA). This contact record documents the activities that were conducted to prepare survey unit 38 for demolition. Survey unit 38 consisted of the 250 plenum located on the second floor of Building 776

The preparation process for survey unit 38 was initiated April 12, 2004 when a package for in-process radiological surveys was prepared and executed. Once the surveys were complete, the following actions were taken as part of the ALARA-based decontamination effort:

- Concrete shaving, joint removals, and hotspot removals were performed on various floor and wall surfaces.
- Ceiling areas were decontaminated or removed as necessary
- Contaminated sealant (such as the sealant near the center of the east wall of plenum 250) was removed to the extent practicable

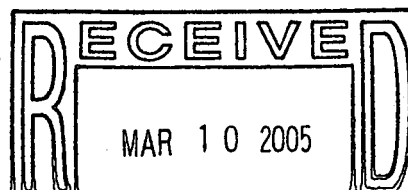
The area was resurveyed in accordance with the Radiological Pre-Demolition Survey Plan for Buildings 776/777. The surveys were provided to the CDPHE project representative, and a walk down of the area was conducted.

In addition to the radiological hazards, the non-radiological hazards have also been addressed in survey unit 38. The following summarizes the non-radiological activities:

- There are no RCRA units associated with this survey unit.
- Chemicals and hazardous substances have been removed.
- Beryllium regulated and controlled areas have been closed. Baseline beryllium characterization and random surveys over the past five (5) years have been below the reporting limit of 0.1 ug/100 cm². Prior to final encapsulation, twenty-four

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(24) samples were collected in the survey unit on horizontal surfaces from floor to ceiling. All samples were below the analytical reporting limit of 0.1 ug/100 cm².

- Polychlorinated biphenyls (PCB) hazards and equipment have been removed.
- Asbestos has been abated.

Based on the survey results and the principles of ALARA, the risks (industrial and radiological) to the workers are greater than the benefit in source term reduction that would be gained through additional decontamination. The state project representative agrees that decontamination inside Survey unit 38 has progressed to the point of reasonably achievable removal and that the subsequent step of encapsulation is appropriate. The following areas will require additional controls during demolition:

- Portions of the north wall
- Portions of the ceiling
- Columns within the survey unit
- Remnants of the West side of the first stage filter racks

The controls for these areas may include any combination of the following:

- The areas will be painted orange, or some other bright color, to make the area readily identifiable during demolition.
- Special briefings will be held with equipment operators and dust control and waste crews prior to initiating demolition of these areas.
- Measures will be taken to minimize the stockpiling of the debris associated with this activity.

In summary, ALARA-based decontamination has been completed, Survey unit 38 will be encapsulated and surveyed for removable contamination, and controls will be applied during demolition. This contact record will be included in the demolition work packages for this survey unit.

Contact Record Prepared By: Dyan Foss

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